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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 FAITH B. KELII,
13 Plaintiff,
14 vs.
15 MONARCH RECOVERY
MANAGEMENT, INC.,
16 Defendant.

Case No.: 2:23-cv-01091-JCM-EJY

MOTION TO EXTEND TIME FOR
DEFENDANT MONARCH
RECOVERY MANAGEMENT, INC.
TO ANSWER THE INITIAL
COMPLAINT

(First Request)

21 Upon meeting and conferring with counsel for Defendant, Monarch Recovery
22 Management, Inc. ("Defendant"), Plaintiff, Faith B. Kelii ("Plaintiff") moves to extend
23 the time for Defendant to answer the initial complaint in this matter. It is hereby
24 stipulated and agreed to by counsel for Plaintiff and counsel for Defendant that
25 Defendant shall have an extension of time to September 1, 2023, to submit a response
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1 to Plaintiff's Complaint. No other requests for extensions of time have been made to
2 date regarding this matter.

3 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists
4 for the requested extension as Defendant is in the process of obtaining local counsel in
5 Nevada to represent its interests in the matter. Accordingly, the parties agree that the
6 requested extension furthers the interest of this litigation and is not being requested in
7 bad faith or to delay these proceedings unnecessarily.

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9 DATED this 23rd day of August 2023.

10 Respectfully submitted,

11 **KAZEROUNI LAW GROUP, APC**

12 /s/ Gustavo Ponce
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21 **ORDER**

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23 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

24 Dated this 23rd day of August, 2023.

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27 **UNITED STATES MAGISTRATE JUDGE**
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